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Division of HIV/AIDS Prevention

National Center for HIV/AIDS, Viral Hepatitis, STD, and TB Prevention

Centers for Disease Control and Prevention

1600 Clifton Road, NE

Mailstop D-21

Atlanta, Georgia 30333

Attn: Male Circumcision Recommendations

Re: Comments Solicited under 79 FR 231-71433
Docket Number CDC -2014-0012

To Whom it May Concern:

We write in reference to the Centers for Disease Control and Prevention's ("CDC") request for comments on "Recommendations for Providers Counseling Male Patients and Parents Regarding Male Circumcision and the Prevention of HIV Infection, STIs, and Other Health Outcomes."

The Anti-Defamation League ("ADL") is one of the leading civil rights and human relations organizations advocating for religious liberty in our nation. For over a century, it has been an ardent advocate for religious freedom for all Americans – whether in the majority or minority. As a civil rights organization, ADL is not in a position to provide medical recommendations relating to the new scientific data on circumcision outlined in the CDC's recommendation request. Rather, we write to comment on the "... cultural, ethical, and religious" factors about which health providers should be aware in discussing circumcision with parents of boys or male patients.

In Judaism, Islam, and other traditions, circumcision of male children is a principal religious obligation. According to Jewish law, circumcision should be performed on the eighth day of an infant boy's life. The procedure and religious rituals surrounding it, called *brit milah* (literally, Covenant of Circumcision), are generally performed by a *mohel*, a trained ritual circumciser. Although virtually all *mohels* receive extensive training on how to perform the circumcision procedure, a significant number of them are not medical doctors.

For observant Jews, abiding by the religious requirement of *brit milah* performed by a *mohel* is the only consideration in deciding on circumcision for a child. It is a right guaranteed by the Free Exercise Clause to the First Amendment, as well as federal and state Religious Freedom Restoration Acts. From a lay perspective, the new scientific data about circumcision cited in the CDC recommendation request does not appear to conflict with parents or male patients who decide to have the procedure for religious reasons. Indeed, this data appears to further support the efficacy of circumcision.

However, there may be health care providers who have concerns about a *mohel* who is not a medical doctor, performing a circumcision. Furthermore, there may be exceptional cases where heightened health risks exist. Particularly in these two circumstances, health care providers should demonstrate sensitivity and show understanding to the religious beliefs of parents or adults about circumcision.

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While we certainly understand that medical professionals have an ethical obligation to convey all the benefits and risks associated with any procedure, health care providers who regularly counsel on circumcision must understand that for certain parents or male patients abiding by religious obligations can be paramount to any medical considerations about the procedure. Therefore, it may be appropriate for health care providers who regularly provide counseling on circumcision to receive training about the multiple religious and cultural perspectives about the procedure which they may encounter, as well as how to appropriately discuss circumcision with families or patients from these traditions.

Undoubtedly, such training would enhance trust and rapport between health care providers and parents or male patients in discussing this very personal decision. Furthermore, if a health care provider understands that circumcision is not an elective procedure for a particular patient, then he or she may be in a better position to discuss with a parent or male patient how to move forward with the procedure while mitigating any health issues associated with it.

We urge the CDC to incorporate these considerations into its final recommendations.

Sincerely,

Deborah M. Lauter

A handwritten signature in black ink that reads "Deborah M. Lauter". The signature is written in a cursive, flowing style.

Director, Civil Rights